

Message

From: Welles, Laura [Welles.Laura@epa.gov]
Sent: 10/13/2016 8:27:44 PM
To: Fogarty, Johnpc [Fogarty.Johnpc@epa.gov]
Subject: RE: Draft CAFO -- Whole Foods

We just crossed emails re: when to send. I'm thinking...

From: Fogarty, Johnpc
Sent: Thursday, October 13, 2016 4:25 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: Draft CAFO -- Whole Foods

I'd like to get your thoughts on this question.

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

Thoughts?

From: Fogarty, Johnpc
Sent: Thursday, October 13, 2016 3:15 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: Re: Draft CAFO -- Whole Foods

Yes it does. Sort of an open question for how much is reflected in the main body of the CAFO and how much detail is in the appendices. Clearly they need to be consistent, but we'll have to see what they have in order to suss that out.

Sent from my iPhone

On Oct 13, 2016, at 3:08 PM, Welles, Laura <Welles.Laura@epa.gov> wrote:

Yes re: "guts" of WF's program in appendices. I want to see what they have already developed, implemented, etc. I also want to see more of the **Ex. 4 CBI** before drafting IR language. Sound good or not good?

From: Fogarty, Johnpc
Sent: Thursday, October 13, 2016 3:02 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: Draft CAFO -- Whole Foods

You did a LOT of work here! And it's looking really good, too. Nice work. Some comments/questions/suggested edits in the attached. I am assuming that the "guts" of WF's program will be in the appendices?

From: Welles, Laura
Sent: Thursday, October 13, 2016 1:56 PM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: RE: Draft CAFO -- Whole Foods

With regard to “consumer products” definition – R6 did not include a definition or list any of the products in the CAFO. R6 only concluded that in general WF has customer returns and expired products that are SW and at a minimum WF generated HW having the characteristic of ignitability (D001), corrosivity (D002) and toxicity (D007, D010, D009, and D011).

The Walmart CAFO had a “consumer products” definition (products sold in consumer product packaging which are transported as part of the Reverse Distribution Process) and did list some of the products (bleaches, pool chlorine and acids, pesticides, fertilizers, paints and varnishes, lamp oil and other ignitable liquids, aerosol products, oven cleaners and various other cleaning agents, automotive products and solvents, and other flammable and corrosive materials.).

From: Fogarty, Johnpc
Sent: Thursday, October 13, 2016 1:20 PM
To: Welles, Laura <Welles.Laura@epa.gov>
Subject: RE: Draft CAFO -- Whole Foods

Thanks – I will look at this asap. Quick reactions to the questions below (in red so they’ll stand out) -

From: Welles, Laura
Sent: Thursday, October 13, 2016 11:47 AM
To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>
Subject: Draft CAFO -- Whole Foods

Attached is the draft Whole Foods CAFO – it’s a bit rough and in need of a fresh set of eyes.

A couple of things:

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

Please review, edit, comment, etc.

Laura

Laura Welles
Attorney Advisor
Waste and Chemical Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
(202) 564-2754